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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION**

JOHNSTON, individually and on behalf of  
 all others similarly situated,

*Plaintiff,*

v.

ADOBE INC.,

*Defendant.*

Case No. 5:25-cv-03052-NW

**STIPULATION EXTENDING TIME TO  
 RESPOND TO COMPLAINT PURSUANT  
 TO L.R. 6-1(a)**

Judge: Hon. Noel Wise  
 Location: Courtroom 3, 5th Floor

1 Pursuant to Civil Local Rule 6-1(a), Plaintiff Bianca Johnston (“Plaintiff”) and Defendant  
2 Adobe Inc. (“Adobe”) (collectively, “the Parties”) by and through their counsel of record, hereby  
3 stipulate as follows:

4 WHEREAS, Plaintiff filed this action against Adobe on April 3, 2025, *see* ECF No. 1;

5 WHEREAS, Adobe was served on April 16, 2025, and pursuant to the Federal Rules of  
6 Civil Procedure, the deadline for Adobe to answer, move, or otherwise respond to the Complaint  
7 is currently May 7, 2025;

8 WHEREAS, this Court entered a Related Case Order on April 17, 2025, in connection with  
9 this case and *Rapak v. Adobe Inc.*, No. 5:25-cv-03032-NW (the “Related Actions”), *see* ECF  
10 No. 9;

11 WHEREAS, Plaintiff moved to consolidate the Related Actions on April 23, 2025 (the  
12 “Motion to Consolidate”), *see Rapak*, No. 5:25-cv-03032-NW, ECF No. 20;

13 WHEREAS, Adobe filed its statement of non-opposition to the Motion to Consolidate on  
14 April 29, 2025, *see Rapak*, No. 5:25-cv-03032-NW, ECF No. 25; and

15 WHEREAS, to facilitate the efficient and orderly resolution of the Related Actions, the  
16 Parties believe that Adobe’s responsive pleading deadline should be extended until the Court rules  
17 on the Motion to Consolidate.

18 NOW, THEREFORE, the Parties, through their undersigned counsel, hereby stipulate and  
19 agree as follows:

- 20 1) Adobe’s responsive pleading deadline is extended until 45 days after the Court’s ruling on  
21 the Motion to Consolidate or as otherwise specified in the Court’s Order on the Motion to  
22 Consolidate.

1 Dated: April 29, 2025

Respectfully submitted,

2 /s/ Angel Tang Nakamura

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25 *Attorneys for Defendant Adobe Inc.*

Dated: April 29, 2025

Respectfully submitted,

/s/ Gary M. Klinger

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**SIGNATURE ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in this document's content and have authorized the filing of this document with the use of their electronic signature.

Dated: April 29, 2025

By: /s/ Angel Tang Nakamura